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2010 FEB -3 PM 12: 54

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

6 Attorneys for the Plaintiff,  
7 JOHNNY TYRONE STRINGFIELD

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

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14 JOHNNY TYRONE STRINGFIELD,  
15  
16 Plaintiff,  
17  
18 vs.

17 TYLER PERRY, THE TYLER PERRY  
18 COMPANY, INC., TYLER PERRY STUDIOS,  
19 LLC, TURNER BROADCASTING SYSTEM,  
20 INC., TIME WARNER, INC., and DOES 1-10,  
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22 Defendants.

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CV10 0784 GW (RZx)  
CASE NO.  
COMPLAINT FOR COPYRIGHT  
INFRINGEMENT AND DEMAND FOR  
JURY TRIAL

1 Plaintiff JOHNNY TYRONE STRINGFIELD ("Plaintiff") makes the following  
2 Complaint against the Defendants:  
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4  
5 **Nature of This Action**  
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7 1. This case involves the unauthorized use of Plaintiff's music and lyrics from the  
8 copyrighted work entitled "I Got Away," by Defendants without a license. The music and lyrics  
9 were synchronized and reduced to digital media, film and audio, which Defendants distributed as  
10 part of their work "Meet the Browns," an episodic television program broadcasted on the TBS  
11 cable television channel.

12 2. Plaintiff is the author and sole owner of the song "I Got Away," which is available  
13 on iTunes and through other distributors. Defendants misappropriated and repeatedly published  
14 the copyrighted music and the copyrighted lyrics of the song, "The Devil thought he had me but I  
15 got away," among others, by having the characters sing the music and lyrics in Episode Number 3  
16 of "Meet the Browns," entitled "Meet the Dependents and the Divas."  
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18  
19 **Jurisdiction and Venue**  
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21 3. This is an action for copyright infringement arising under the Copyright Act of  
22 1976, 17 U.S.C. § 101 *et seq.* ("The Copyright Act"). This Court has exclusive subject matter  
23 jurisdiction pursuant to 28 U.S.C. §§1338(a) and 1331.  
24

25 4. Independently, the Court has subject matter jurisdiction over this action pursuant to  
26 28 U.S.C. §§ 1331, 1332 and 1338.  
27  
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1           5.       Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b) and  
2 1400.

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5                                   **The Parties**

6  
7           6.       Plaintiff JOHNNY TYRONE STRINGFIELD is an individual and resident of the  
8 State of North Carolina.

9           7.       Defendant THE TYLER PERRY COMPANY, INC. ("TPC") is a corporation  
10 incorporated in the State of Georgia, doing business in the State of California. Plaintiff is  
11 informed and believes that TPC is qualified to do business in the State of California. TPC has  
12 appropriated intellectual property belonging to the Plaintiff.

13           8.       Defendant TYLER PERRY STUDIOS, LLC ("TP-LLC") is a limited liability  
14 company organized under the laws of the State of Georgia, doing business in the State of  
15 California. TP-LLC has appropriated intellectual property belonging to the Plaintiff.

16  
17           9.       Defendant TURNER BROADCASTING SYSTEM, INC. a Delaware Corporation,  
18 ("TURNER BROADCASTING"), is doing business in the State of California. Plaintiff is  
19 informed and believes that TURNER BROADCASTING is qualified to do business in the State of  
20 California. TURNER BROADCASTING appropriated, published and distributed intellectual  
21 property belonging to the Plaintiff.

22  
23           10.      Defendant TIME WARNER, INC. a Delaware Corporation, ("TIME WARNER"),  
24 is doing business in the State of California. Plaintiff is informed and believes that TIME  
25 WARNER is qualified to do business in the State of California. TIME WARNER appropriated,  
26 published, and distributed intellectual property belonging to the Plaintiff.

1 11. Defendant TYLER PERRY is an individual. Plaintiff is informed and believes that  
2 TYLER PERRY is doing business in the State of California. TYLER PERRY appropriated,  
3 published and distributed intellectual property belonging to the Plaintiff.

4 12. Plaintiff is informed and believes that TPC, TP-LLC, and / or TYLER PERRY is /  
5 are the author of the infringing work "Meet the Browns," an episodic television program which  
6 has used and appropriated intellectual property of the Plaintiff.

7 13. Plaintiffs are unaware of the true names and capacities, whether individual,  
8 corporate, associate, or otherwise, of defendants Does 1 through 10, inclusive, or any of them, and  
9 therefore sue these defendants, and each of them, by such fictitious names. Plaintiffs will amend  
10 this Complaint when the identities of these defendants are ascertained.  
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14 **FIRST CAUSE OF ACTION**

15 **COPYRIGHT INFRINGEMENT OF LYRICS**  
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17 14. Plaintiff realleges and incorporates paragraphs 1 through 13 as if fully set forth  
18 herein.

19 15. Plaintiff JOHNNY TYRONE STRINGFIELD is the author of the lyrics of the song  
20 "I Got Away," published and copy written in 2007 by Plaintiff.  
21

22 16. Effective January 17, 2008, Plaintiff registered the lyrics of the song "I Got Away"  
23 with the Register of Copyrights. The Certificate of Registration bears the number Pau 3-406-236.

24 17. On or about January 14, 2009, Defendants began reproducing, performing,  
25 adapting and distributing the copyrighted material by incorporating an entire verse of the lyrics of  
26 Plaintiff's work (singing "The Devil thought he had me but I got away"), willfully and without a  
27 license, within their audiovisual work, in the episodic television program entitled "Meet the  
28

1 Browns,” Episode No. 3 entitled “Meet the Dependants and the Divas”. Unless enjoined and  
2 restrained, Defendants’ conduct threatens to further infringe Plaintiff’s copyright interests.

3 18. At no time has Plaintiff authorized any of the Defendants to reproduce, adapt,  
4 perform, distribute or otherwise use the lyrics of the song “I Got Away.”

5 19. Defendants willfully copied the lyrics of the song “I Got Away” when characters in  
6 Episode No. 3 of “Meet the Browns” sang the song.

7 20. Defendants failed to seek permission to use Plaintiff’s work, and exploited same  
8 work and incorporated it in Defendants’ Episode No. 3 of “Meet the Browns.”

9 21. By reason of Defendants’ infringement and threatened infringement, Plaintiff has  
10 sustained and will continue to sustain substantial injury, loss and damage to his ownership rights  
11 in the copyrighted work.

12 22. Further irreparable harm to Plaintiff is imminent as a result of Defendants’ conduct,  
13 and Plaintiff is without an adequate remedy at law. Plaintiff is entitled to an injunction restraining  
14 Defendants, their officers, directors, agents, employees, representatives and all persons acting in  
15 concert with them from engaging in further such acts of copyright infringement.

16 23. Plaintiff is further entitled to recover from all Defendants the damages sustained by  
17 Plaintiff as a result of Defendants’ acts of copyright infringement. Plaintiff is at present unable to  
18 ascertain the full extent of the monetary damage he has suffered by reason of the Defendants’ acts  
19 of copyright infringement, but Plaintiff are informed and believe, and on the basis of such  
20 information and belief allege, that Plaintiff has sustained such damage in amount exceeding  
21 \$100,000.

22 24. Plaintiff is further entitled to recover from Defendants the gain, profits and  
23 advantages they have obtained as a result of their acts of copyright infringement. Plaintiff is at  
24 present unable to ascertain the full extent of the gains, profits and advantages defendant has

1 obtained by reason of its acts of copyright infringement, but Plaintiff is informed and believes, and  
2 on the basis of such information and belief alleges, that Defendants have obtained such gains,  
3 profits, and advantages in an amount exceeding \$100,000.

4 25. Plaintiff is entitled to compensation in the form of an implied license, statutory  
5 damages, actual damages, punitive damages, attorneys' fees, as well as pre and post judgment  
6 interest for the infringement and wrongful use of the song's lyrics and music and infringement of  
7 Plaintiffs' ownership to the music and lyrics of the song.

8 26. Defendants' direct and willful acts have damaged Plaintiff, causing him harm in  
9 deliberate prejudice of his property rights.  
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12 **SECOND CAUSE OF ACTION**

13 **COPYRIGHT INFRINGEMENT OF MUSIC**  
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16 27. Plaintiff realleges and incorporates paragraphs 1 through 13 as if fully set forth  
17 herein.

18 28. Plaintiff JOHNNY TYRONE STRINGFIELD is the author of the music of the  
19 song "I Got Away," published and copy written in 2007 by Plaintiff.

20 29. Effective January 17, 2008, Plaintiff registered the music of the song "I Got Away"  
21 with the Register of Copyrights. The Certificate of Registration bears the number Pau 3-406-236.  
22

23 30. On or about January 14, 2009, Defendants began reproducing, performing,  
24 adapting, and distributing the copyrighted material by incorporating the music of Plaintiff's work  
25 in Episode No. 3 of "Meet the Browns." Unless enjoined and restrained, Defendants' conduct  
26 threatens to further infringe Plaintiff's copyright interests.  
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1           31. At no time has Plaintiff authorized any of the Defendants to reproduce, adapt,  
2 perform, distribute or other wise use the music of the song "I Got Away."

3           32. Defendants willfully copied the music of the song "I Got Away" when characters in  
4 Episode No. 3 of "Meet the Browns" sang the song.

5           33. Defendants failed to seek permission to use Plaintiff's work, and exploited same  
6 work and incorporated it in Defendants' Episode No. 3 of "Meet the Browns."

7           34. By reason of Defendants' infringement and threatened infringement, Plaintiff has  
8 sustained and will continue to sustain substantial injury, loss and damage to their ownership rights  
9 in the copyrighted work.  
10

11           35. Further irreparable harm to Plaintiff is imminent as a result of Defendants' conduct,  
12 and Plaintiff is without an adequate remedy at law. Plaintiffs are entitled to an injunction  
13 restraining Defendants, their officers, directors, agents, employees, representatives and all persons  
14 acting in concert with them from engaging in further such acts of copyright infringement.  
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16           36. Plaintiff is further entitled to recover from all Defendants the damages sustained by  
17 Plaintiff as a result of Defendants' acts of copyright infringement. Plaintiff is at present unable to  
18 ascertain the full extent of the monetary damage he has suffered by reason of the Defendants' acts  
19 of copyright infringement, but Plaintiff is informed and believes, and on the basis of such  
20 information and belief alleges, that Plaintiff has sustained such damage in amount exceeding  
21 \$100,000.  
22

23           37. Plaintiff is further entitled to recover from Defendants the gain, profits and  
24 advantages they have obtained as a result of their acts of copyright infringement. Plaintiff is at  
25 present unable to ascertain the full extent of the gains, profits and advantages defendant has  
26 obtained by reason of its acts of copyright infringement, but Plaintiff is informed and believes, and  
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1 on the basis of such information and belief alleges, that Defendants have obtained such gains,  
2 profits, and advantages in an amount exceeding \$100,000.

3 38. Plaintiff is entitled to compensation in the form of an implied license, statutory  
4 damages, actual damages, punitive damages, attorneys' fees, as well as pre and post judgment  
5 interest for the infringement and wrongful use of the song's lyrics and music and infringement of  
6 Plaintiffs' ownership to the music and lyrics of the song.

7  
8 39. Defendants' direct and willful acts have damaged Plaintiff, causing him harm in  
9 deliberate prejudice of his property rights.

10 WHEREFORE, Plaintiff prays for relief as follows:

11 A. For a temporary restraining order, preliminary and permanent injunction  
12 enjoining and restraining Defendants and all persons acting in concert with them from  
13 manufacturing, reproducing, distributing, adapting, displaying, advertising, promoting,  
14 offering for sale and/or selling, or performing any materials that are substantially similar to  
15 the copyrighted work, and to deliver to the Court for destruction or other reasonable  
16 disposition all such materials and means for producing same in Defendants' possession or  
17 control;  
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19  
20 B. For actual damages and Defendants; profits in an amount in excess of  
21 \$100,000 to be determined at trial, plus interest;  
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23 C. For an award of statutory damages;

24 D. For an award of exemplary and punitive damages;

25 E. For reasonable attorneys' fees and costs incurred in connection with this  
26 action;  
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1 F. For pre-judgment and post-judgment interest; and

2 G. For such other and further relief as the Court deems just and proper.

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4  
5 DATED: February 3, 2010

AHDOOT & WOLFSON, APC

6  
7 By 

8 Robert Ahdoot  
9 Attorneys for Plaintiffs  
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**JURY DEMAND**

Plaintiffs respectfully request a jury trial on all issues triable thereby.

DATED: February 3, 2010

AHDOOT & WOLFSON, APC

By 

Robert Ahdoot  
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge George H. Wu and the assigned discovery Magistrate Judge is Ralph Zarefsky.

The case number on all documents filed with the Court should read as follows:

**CV10- 784 GW (RZx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

===== :  
**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☒ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☐ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Robert Ahdoot (Bar No. 172098)  
 Tina Wolfson (Bar No 174806)  
 AHDOOT & WOLFSON, APC  
 10850 Wilshire Blvd., Suite 370  
 Los Angeles, California 90024  
 Attorneys for Plaintiff, Johnny Tyrone Stringfield

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

Johnny Tyrone Stringfield

CASE NUMBER

PLAINTIFF(S)

**CV10 0784 GW (RZx)**

v.

Tyler Perry, The Tyler Perry Company, Inc., Tyler  
 Perry Studios, LLC, Turner Broadcasting System, Inc.,  
 Time Warner, Inc. and DOES 1-10,

DEFENDANT(S).

**SUMMONS**

TO: DEFENDANT(S): Tyler Perry, The Tyler Perry Company, Inc., Tyler Perry Studios, LLC,  
Turner Broadcasting System, Inc., Time Warner, Inc. and DOES 1-10,

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ \_\_\_\_\_ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Robert Ahdoot or Tina Wolfson, whose address is 10850 Wilshire Blvd., Suite 370, Los Angeles, California 90024. Tel: 310-474-9111. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

**CHRISTOPHER POWERS**

Dated: FEB - 3 2010

By: \_\_\_\_\_  
 Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> ) JOHNNY TYRONE STRINGFIELD		<b>DEFENDANTS</b> TYLER PERRY, THE TYLER PERRY COMPANY, INC TYLER PERRY STUDIOS, LLC, TURNER BROADCASTING SYSTEM, INC, TIME WARNER, INC, and DOES 1-10	
<b>(b)</b> Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same )  AHDODT & WOLFSON, APC    Tel: 310-474-9111 10850 Wilshire Blvd., Suite 370 Los Angeles, California 90024		Attorneys (If Known)	

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only )  <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table border="1" style="width:100%"><tr><td>Citizen of This State</td><td>PTF <input type="checkbox"/> 1</td><td>DEF <input type="checkbox"/> 1</td><td>Incorporated or Principal Place of Business in this State</td><td>PTF <input type="checkbox"/> 4</td><td>DEF <input type="checkbox"/> 4</td></tr><tr><td>Citizen of Another State</td><td><input type="checkbox"/> 2</td><td><input type="checkbox"/> 2</td><td>Incorporated and Principal Place of Business in Another State</td><td><input type="checkbox"/> 5</td><td><input type="checkbox"/> 5</td></tr><tr><td>Citizen or Subject of a Foreign Country</td><td><input type="checkbox"/> 3</td><td><input type="checkbox"/> 3</td><td>Foreign Nation</td><td><input type="checkbox"/> 6</td><td><input type="checkbox"/> 6</td></tr></table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6														

<b>IV. ORIGIN</b> (Place an X in one box only ) <input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify): <input type="checkbox"/> 6 Multi-District Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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<b>V. REQUESTED IN COMPLAINT:</b> <b>JURY DEMAND:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Check 'Yes' only if demanded in complaint.) <b>CLASS ACTION</b> under F.R.C.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>MONEY DEMANDED IN COMPLAINT:</b> \$ excess of \$100,000
---

<b>VI. CAUSE OF ACTION</b> (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
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<b>VII. NATURE OF SUIT</b> (Place an X in one box only.)					
<b>CONSUMER STATUTES</b> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutional of State Statutes	<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROPERTY RIGHTS</b> <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

CV10 0784

FOR OFFICE USE ONLY: Case Number: \_\_\_\_\_

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes  
 If yes, list case number(s): \_\_\_\_\_

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes  
 If yes, list case number(s): \_\_\_\_\_

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.  
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b)

County in this District: *	California County outside of this District; State, if other than California, or Foreign Country
	State of North Carolina

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.  
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c)

County in this District: *	California County outside of this District; State, if other than California, or Foreign Country
County of Los Angeles	State of Georgia, State of Delaware

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.  
 Note: In land condemnation cases, use the location of the tract of land involved.

County in this District: *	California County outside of this District; State, if other than California, or Foreign Country
County of Los Angeles	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date February 3, 2010

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended, plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))